

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

STEPHEN PENROSE, JAMES
THOMAS, JOSEPH GUARDINO, and
DANIEL POPE on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

BUFFALO TRACE DISTILLERY, INC.,
OLD CHARTER DISTILLERY CO., and
SAZERAC COMPANY, INC.

Defendants.

CASE NO. 4:17-CV-00294

**JOINT MOTION OF ALL PARTIES FOR EXTENSION OF TIME TO PRODUCE
DOCUMENTS**

Plaintiffs Stephen Penrose, James Thomas, Joseph Guardino, and Daniel Pope (“Plaintiffs”) and defendants Buffalo Trace Distillery, Inc., Old Charter Distillery Co., and Sazerac Company, Inc. (“Defendants”) (collectively, the “Parties”), by and through their respective counsel, hereby jointly submit this motion to extend time in which the Parties are to produce documents pursuant to the Court’s February 27, 2018 Case Management Order (Dkt. No. 39). The Parties’ joint request is based on the following:

The Court’s February 27, 2018 Case Management Order requires any motions for class certification to be filed no later than February 28, 2019.

The Court’s February 27, 2018 Case Management Order requires the Parties to produce documents no later than June 22, 2018, which is more than eight months before Plaintiffs’ class certification deadline.

Plaintiffs served their First Set of Requests for Production of Documents on Defendants on February 21, 2018.

Defendants served their Responses and Objections to Plaintiffs’ First Set of Requests for Production of Documents on April 6, 2018.

Plaintiffs filed a First Amended Complaint on June 11, 2018 (Dkt. No. 45).

The Parties have engaged in meet and confer efforts regarding Defendants’ written Responses to Plaintiffs’ First Set of Requests for Production of Documents, Defendants’ forthcoming document production, and other discovery-related matters, and are currently analyzing the effect of the First Amended Complaint on discovery.

Defendants have been working diligently to review documents in anticipation of the June 22, 2018 deadline.

Due to the volume and nature of documents at-issue, and the effect of Plaintiffs' just recently filed First Amended Complaint on discovery, Defendants require additional time to complete their review and production of documents responsive to Plaintiffs' First Set of Requests for Production of Documents.

The Parties agree to extend that deadline by thirty (30) days to July 23, 2018 to allow Defendants sufficient time to complete the document production required by the Court's February 27, 2018 Case Management Order.

If granted, the extension will alter only the deadline for the Parties to move to compel following the production of documents. All other deadlines will remain the same.

This is the first extension requested by the Parties.

The Parties agree that good cause exists for the extension because of the foregoing reasons.

NOW, THEREFORE, the Parties jointly stipulate and move the Court to extend the deadline for the Parties to produce documents pursuant to the Court's Case Management Order until July 23, 2018.

Respectfully submitted,

[Continued on next page]

By:/s/Michelle C. Doolin

Michelle C. Doolin

Dated: June 19, 2018

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By:/s/Yitzchak Kopel

Yitzchak Kopel

Dated: June 19, 2018

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Attorneys for Plaintiffs

Certificate of Service

I hereby certify that on June 19, 2018, I filed the documents named below pursuant to the Court's Electronic Case Filing Administrative Policies and Procedures Manual:

**JOINT MOTION OF ALL PARTIES FOR EXTENSION OF TIME TO
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with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record in this case:

Yitzchak Kopel
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*Attorneys for Plaintiffs Stephen Penrose,
James Thomas, Joseph Guardino,
and Daniel Pope*

I declare under penalty of perjury under the laws of the United States and the State of California that the above is true and correct. Executed on June 19, 2018, at San Diego, California.

/s/Michelle C. Doolin

Michelle C. Doolin
(CA State Bar No. 179445)